

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,
Plaintiff

Case No.: 24-30474

v.

Christopher Pierce,
Defendant.

NOTICE OF HEARING

TO: Assistant U.S. Attorney Thomas Patrick Martin
211 W. Fort St., Suite 2001
Detroit, MI 48226

PLEASE TAKE NOTICE that the Defendant's attached Motion shall be heard on a date and time set by the Case Manager for the United States Duty Court Magistrate Judge.

Respectfully submitted,

By: /s/ Sidney Kraizman, Esq.
Sidney Kraizman P16199)
Attorney for Defendant
645 Griswold, Suite 1900 Penobscot
Building
Detroit, Michigan 48226
(313) 961-7078
sidkraizman@sbcglobal.net

DATED: January 17, 2025

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,
Plaintiff

Case No.: 24-30474

v.

Christopher Pierce,
Defendant.

**MOTION TO WITHDRAW AS ATTORNEY FOR DEFENDANT &
FOR APPOINTMENT OF A NEW ATTORNEY AND BRIEF**

Now comes the Defendant Christopher Pierce by and through his attorney Sidney Kraizman and moves this Honorable Court for an Order that present counsel Sidney Kraizman be withdrawn as the attorney for Defendant Pierce and a new attorney appointed for the Defendant for the following reasons.

1. Defendant Pierce is charged in the Criminal Complaint with having on October 2, 2024, in Jackson County, Michigan violated 18 U.S.C. section 875(c) by “Threats made in interstate communications.”
2. Present counsel was appointed to represent Mr. Pierce and entered his Appearance on November 8, 2024.
3. The Preliminary Hearing in this case is set for February 24, 2025, at 1 p.m.
4. Defendant Pierce was released on conditions which include reporting to the Pretrial Services Agency.

5. After being released Defendant Pierce successfully attended truck driving school and is gainfully employed as a truck driver.
6. The Government in this case has provided the Defense with a substantial amount of discovery but not yet all of the discovery.
7. This motion is filed early in the case.
8. There has been an irreconcilable breakdown in the attorney client relationship. Defendant and his attorney are not able to work together in a manner that best serves the interests of the client. There is “other good cause” to withdraw under Michigan Rules of Professional Conduct 1.16(b)(6); See also United States v. Steele, 919 F.3d 965, 973 (6th Cir. 2019)
9. The Assistant United States Attorney T. Patrick Martin on 1/17/2025 informed present counsel that he did not object to this motion.
10. It is the opinion of present counsel that Defendant Pierce does not object to the requested order that a new attorney be appointed to represent him.

Wherefore the Defendant Pierce by his Attorney Sidney Kraizman respectfully requests that this Honorable Court order that Attorney Sidney Kraizman be withdrawn as the attorney and that a new attorney be appointed to represent Defendant Pierce.

Respectfully submitted,

/s/Sidney Kraizman, Esq.
Sidney Kraizman (P16199)
645 Griswold St., Suite 1900 Penobscot Bldg.
Detroit, Mi. 48226
(313) 961-7078
(P16199)

DATED: 1-17-2025

CERTIFICATE OF SERVICE

I hereby certify that on 1-17-2025 I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Assistant U.S. Attorney Thomas Patrick Martin
211 W. Fort St., Suite 2001
Detroit, MI 48226
313) 226-9168
Thomas.Martin@usdoj.gov

I hereby certify that I also served Defendant Christopher Pierce at his home address by U.S. mail and at his email address. (The specific address & email are withheld for privacy concerns).

this date of: 1-17-2025.

/s/ Sidney Kraizman, Esq.